

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION)	Master File No.: 12-md-02311 Honorable Marianne O. Battani
In Re: All Auto Parts Cases)	2:12-MD-02311-MOB-MKM
THIS DOCUMENT RELATES TO: ALL AUTO PARTS CASES)	

**NON-PARTY HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC’S NOTICE
OF FILING UNDER SEAL ITS OBJECTIONS TO, AND MOTION TO MODIFY, THE
SPECIAL MASTER’S ORDER REGARDING NON-PARTY RULE 30(b)(6)
DEPOSITIONS AND FAILURE TO RECOGNIZE HYUNDAI MOTOR
MANUFACTURING ALABAMA AS A SMALLER SSE**

On April 18, 2016, HMMA requested that Special Master Esshaki treat it as a “Smaller SSE” that is carved out or held in abeyance from the requirement of making witness(es) available to testify in depositions. HMMA attached and cited to in that request a declaration from HMMA employee Angela James that includes HMMA’s confidential and proprietary business information. Pursuant to the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information (the “Protective Order”), 12-md-2311, Dkt. 200, HMMA hereby provides notice that the following is being filed under seal:

- NON-PARTY HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC’S OBJECTIONS TO, AND MOTION TO MODIFY, THE SPECIAL MASTER’S ORDER REGARDING NON-PARTY RULE 30(b)(6) DEPOSITIONS AND FAILURE TO RECOGNIZE HYUNDAI MOTOR MANUFACTURING ALABAMA AS A SMALLER SSE
- EXHIBIT A: Email to Special Master transmitting Declaration of Angela James

Paragraph 19 of the Protective Order provides that “this Order shall serve as a stipulated

order for purposes of Civil Local Rule 5.3(b)” and requires all materials containing “Confidential Information or Highly Confidential Information” (as defined in the Protective Order) to be filed under seal according to the procedures contained in the Protective Order. *See* Protective Order ¶7. The Protective Order also applies “to non-parties.” *See* Protective Order ¶19. HMMA has determined in good faith that its filing contains confidential and proprietary information that meets the Protective Order’s definitions of “Confidential” or “Highly Confidential—Outside Attorneys Only” information. No means other than sealing will preserve the confidentiality of HMMA’s confidential business information.

Dated: May 4, 2016

Respectfully submitted,

/s/ Meredith Jones Kingsley

Meredith Jones Kingsley

Peter Kontio

ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, Georgia 30309

Phone: 404.881.7000 (direct)

Fax: 404.253.7777 (fax)

meredith.kingsley@alston.com

peter.kontio@alston.com

*Attorneys for Hyundai Motor Manufacturing
Alabama, LLC (“HMMA”)*

CERTIFICATE OF SERVICE

I certify that on May 4, 2016, I caused a true and correct copy of the foregoing NON-PARTY HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC'S NOTICE OF FILING UNDER SEAL ITS OBJECTIONS TO, AND MOTION TO MODIFY, THE SPECIAL MASTER'S ORDER REGARDING NON-PARTY RULE 30(b)(6) DEPOSITIONS AND FAILURE TO RECOGNIZE HYUNDAI MOTOR MANUFACTURING ALABAMA AS A SMALLER SSE to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Meredith Jones Kingsley

Meredith Jones Kingsley

*Attorney for Hyundai Motor Manufacturing
Alabama, LLC ("HMMA")*